

Sarai L. Thornton, Esq. (SBN 271389)
 Sthornton@skanemills.com
 SKANE MILLS LLP
 1120 Town Center Drive, Suite 200
 Las Vegas, Nevada 89144
 (702) 363-2535 / Fax (702) 363-2534
Attorney for Defendant Trans Union LLC

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF NEVADA**

DANIELLE GOLDSTEIN,

Plaintiff,

TRANS UNION LLC, EXPERIAN
 INFORMATION SOLUTIONS, INC., and
 CLARITY SERVICES, INC.,

Defendants.

Case No. 2:24-cv-00305-GMN-DJA

**ORDER
 EXTENDING DEFENDANT TRANS
 UNION LLC’S TIME TO FILE AN
 ANSWER OR OTHERWISE RESPOND
 TO PLAINTIFF’S COMPLAINT
 (FIRST REQUEST)**

Plaintiff Danielle Goldstein (“Plaintiff”), and Defendant Trans Union LLC (“Trans Union”), by and through their respective counsel, file this Joint Stipulation Extending Defendant Trans Union’s Time to Respond to Plaintiff’s Complaint.

On February 13, 2024, Plaintiff filed her Complaint. Trans Union was served with Plaintiff’s Complaint on February 16, 2024. The current deadline for Trans Union to answer or otherwise respond to Plaintiff’s Complaint is March 8, 2024.

Good cause exists for Trans Union’s request for an extension to file its answer or otherwise respond to the Complaint. Trans Union needs additional time to locate and assemble the documents and information relating to Plaintiff’s credit file and any dispute(s) submitted by Plaintiff. In addition, Trans Union’s counsel needs additional time to review Trans Union’s documents and information and to respond to the allegations in the Complaint. Further, the added time afforded by the extension will also enable Plaintiff and Trans Union to fully explore an early settlement, potentially obviating the need for further use of court time and resources.

Plaintiff has agreed to extend the deadline in which Trans Union has to answer or otherwise respond to Plaintiff's Complaint up to and including March 22, 2024. This is the first stipulation for extension of time for Trans Union to respond to Plaintiff's Complaint.

Dated this 8th day of March 2024.

SKANE MILLS LLP

/s/ Sarai L. Thornton

Sarai L. Thornton, Esq. (SBN 271389)
Sthornton@skanemills.com
1120 Town Center Drive, Suite 200
Las Vegas, Nevada 89144
Telephone: (702) 363-2535
Counsel for Trans Union LLC

FREEDOM LAW FIRM

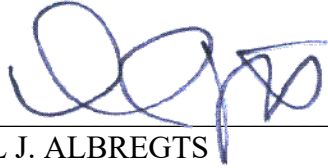
/s/ George Haines

George Haines (Bar No. 9411)
ghaines@freedomlegalteam.com
Gerardo Avalos (Bar No. 15171)
gavalos@freedomlegalteam.com
8985 S. Eastern Avenue, Suite 100
Las Vegas, NV 89123
Telephone: (702) 880-5554
Counsel for Plaintiff

ORDER

The Joint Stipulation for Extension of Time for Trans Union LLC to file an answer or otherwise respond is so ORDERED AND ADJUDGED.

Dated this 11th day of March, 2024.

A handwritten signature in blue ink, appearing to read 'D. Albregts', is written over a horizontal line.

DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on this the 8th of March 2024, I filed **JOINT STIPULATION AND ORDER EXTENDING DEFENDANT TRANS UNION LLC'S TIME TO FILE AN ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel:

George Haines
ghaines@freedomlegalteam.com
Gerardo Avalos
gavalos@freedomlegalteam.com
8985 S. Eastern Avenue, Suite 100
Las Vegas, NV 89123
(702) 880-5554
(702) 967-6685 Fax
Counsel for Plaintiff

/s/ Pouneh Porooshani
An employee of SKANE MILLS LLP